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February 14, 2002

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C.

Identification Number: C00344390

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Gibson:

Reference is made to your letter dated February 7, 2002 where you inform us of certain inquiries you have regarding specific contributions and expenditures and filing requirements. Please accept the following explanation for the questions raised:

The amendments to the Mid-Year Report (1/1/01-6/30/01) were filed electronically on February 6, 2002 as required by federal law, 11CFR § 401.18(f).

We are aware that federal regulation requires that amendments to reports filed electronically be filed in an electronic format. However, as was explained to Mrs. Robin Kelley in several conversations and letters, certain technical problems were encountered with our system that prevented us from complying with such regulations. The new FEC File 4 program would not accept our report submittal due to an unknown "Bad Format Error".

Not knowing what the problem was, we contacted Mr. Carlos Luna of the technical assistance department who worked with us trying to figure out why the program would not accept our electronic filing. In the mean time, as we noticed our deadline approaching for the Year-End Report (7/1/01-12/31/01) without a solution to our computer difficulties in sight, we sent a paper filing of the Report on January 30, 2002. With it we also included paper copies of the amendments to the Mid-Year Report (1/1/01 - 6/30/01).

Around a week later, Mr. Luna informed us that the reasons why the system would not accept our electronic filing in FEC File 4 was that the program did not recognize certain Spanish language letters and accents present in our reports and amendments. Consequently, he corrected our reports eliminating all Spanish letters and accents from the format.

